



August 31, 2023

Via ECF and E-mail

Hon. Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

**Re: *In re Tether and Bitfinex Crypto Asset Litigation*, 19-CV-09236 (KPF) –
Letter Motion to File Exhibits Under Seal**

Dear Judge Failla,

We represent Plaintiffs in the above-referenced action. Pursuant to Rule 9 of this Court's Individual Rules of Practice in Civil Cases, we write to request permission to file the exhibits to Plaintiffs' August 31, 2023 Letter Motion to the Court ("Plaintiffs' Letter Motion") under seal, and Plaintiffs' Letter Motion in redacted form.

Plaintiffs' Letter Motion, and the exhibits thereto, contain information that has been designated as Confidential or Attorneys' Eyes Only by Defendants pursuant to this Court's Protective Order. ECF No. 151, at ¶ 3. Plaintiffs do not object to the characterization of these exhibits and related redacted information as Confidential or Attorneys' Eyes Only for the limited purposes of this filing.

Accordingly, Plaintiffs respectfully request leave to file Plaintiffs' Letter Motion in redacted form, and the exhibits thereto under seal, to avoid any improper disclosure of information Defendants have designated as Confidential or Attorneys' Eyes Only. *See* ECF No. 151, at ¶ 4.b.

Hon. Katherine Polk Failla
August 31, 2023

Respectfully submitted,

/s/ Andrew R. Dunlap

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cc: All Counsel of Record (via ECF)